

# EXHIBIT A

**From:** Papenhausen, Lauren  
**To:** CS Flashner; Frank, Stephen (USAMA) 1  
**Cc:** Reitmeier, Emily A; B Kelly; McGee-Tubb, Mathilda; Kendall, Michael; J Sharp; Chu, Yanbing; Mulcahy, Peter; EP Beirne; Michael Loucks; Jack Dicanio; Andrew Tomback  
**Subject:** RE: Excluding the Names of the Defendant's Children from the Government's Witness List  
**Date:** Friday, July 30, 2021 4:57:30 PM

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Steve:

We want to provide notice that John Wilson may call as witnesses: Leslie Wilson; John Wilson, Jr.; Courtney Wilson; and Mary Wilson. Along the same lines (and for the same reasons) as the parties' agreement (below) regarding exclusion of the defendants' children from the government's witness list, we did not want to include Mr. Wilson's family members on any publicly filed witness list, but we did want to provide notice of the possibility that we may call one or more of them as witnesses. Please direct any communications with any of these potential witnesses through Mike Kendall or me.

Thanks,  
Lauren

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**From:** CS Flashner <[csflashner@mintz.com](mailto:csflashner@mintz.com)>  
**Sent:** Thursday, June 24, 2021 4:50 PM  
**To:** Frank, Stephen (USAMA) 1 <[Stephen.Frank@usdoj.gov](mailto:Stephen.Frank@usdoj.gov)>  
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**Subject:** Excluding the Names of the Defendant's Children from the Government's Witness List

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Cory Flashner**  
Member

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